

## CALCULATION OF DAMAGES FOR EACH PLAINTIFF

### Cintya Castro

<b>Period of Employment:</b>	<b>School Year 2015-2016 (50 weeks)</b>
Regular hourly rate:	\$17.00 per hour
Average Hours worked per week:	44.5 (paid for only 37.5 hours per week)
Unpaid regular hours per week:	2.5 hours (40 – 37.5)
Regular wages owed per week:	\$42.50 (2.5 hours x \$17.00 per hour)
Total regular wages owed for period:	\$2,125.00 (\$42.50/week x 50 weeks)
Unpaid overtime hours per week:	4.5
Overtime rate:	\$25.50/hr (\$17.00/hr regular rate x 1.5 premium)
Overtime wages owed per week:	\$114.75 (4.5 hours x \$25.50)
Total overtime wages owed for period:	\$5,737.50 (\$114.75/week x 50 weeks)
<b>Total wages owed for period:</b>	<b>\$7,862.50 (\$2,125.00 + \$5,737.50)</b>
<b>Period of Employment:</b>	<b>School Year 2016-2017 (48 weeks)</b>
Pay rate:	\$18.00 per hour
Average Hours worked per week:	44.5 (paid for only 37.5 hours per week)
Unpaid regular hours per week:	2.5 hours (40 – 37.5)
Regular wages owed per week:	\$45.00 (2.5 hours x \$18.00 per hour)
Total regular wages owed for period:	\$2,160.00 (\$45.00/week x 48 weeks)
Unpaid overtime hours per week:	4.5
Overtime rate:	\$27.00/hr (\$18.00/hr regular rate x 1.5 premium)
Overtime wages owed per week:	\$121.50 (4.5 hours x \$27.00)
Total overtime wages owed for period:	\$5,832.00 (\$121.50/week x 48 weeks)
<b>Total wages owed for period:</b>	<b>\$7,992.00 (\$2,160.00 + 5,832.00)</b>
<b>Period of Employment:</b>	<b>School Year 2017-2018 (26 weeks)<sup>1</sup></b>
Pay rate:	\$18.00 per hour
Average Hours worked per week:	39.5 (paid for only 37.5 hours per week) <sup>2</sup>
Unpaid regular hours per week:	2.0 hours (39.5 – 37.5)
Regular wages owed per week:	\$36.00 (2.0 hours x \$18.00 per hour)
<b>Total wages owed for period:</b>	<b>\$936.00 (\$36.00/week x 26 weeks)</b>

GROSS WAGES OWED TO CASTRO: \$16,790.50

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<sup>1</sup> Defendants terminated Ms. Castro before she could finish the term.

<sup>2</sup> Ms. Castro has no claim for unpaid overtime during this period because she worked less than 40 hours per week.

**Marcela Latorre**

<b>Period of Employment:</b>	<b>School Year 2017 - 2018 (43 weeks)</b>
Regular hourly rate:	\$24.42 <sup>3</sup>
Average Hours worked per week:	49.13
Unpaid overtime hours per week:	9.13
Overtime rate:	\$36.63 (\$24.42/hr regular rate x 1.5 premium)
Overtime wages owed per week:	\$334.63 (9.13 hours x \$36.63)

GROSS WAGES OWED TO LATORRE: \$14,380.49 (\$334.43/week x 43 weeks)

**Yulisa Delgado**

<b>Period of Employment:</b>	<b>School Year 2015 - 2016 (34 weeks)</b>
Regular hourly rate:	\$13.00
Average Hours worked per week:	52.26
Unpaid overtime hours per week:	12.26
Overtime rate:	\$19.50 (\$13.00/hr regular rate x 1.5 premium)
Overtime wages owed per week:	\$239.07 (12.26 hours x \$19.50)
Total overtime wages owed for period:	\$8,128.38 (\$239.07/week x 34 weeks)
Unpaid 400 Hours from 2014:	\$5,200
Unpaid Vacation (160 hours x \$13.00):	\$2,080 <sup>4</sup>

GROSS WAGES OWED TO DELGADO: \$15,408.38

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<sup>3</sup> Ms. Latorre was improperly paid a salary instead of an hourly rate as required by the FLSA. Her regular hourly rate is calculated as:

\$42,000 annual salary / 43 workweeks = \$976.74/week  
\$976.74 / 40 regular hours per week = \$24.42/hour (rounded to closest cent)